UNITED STATES DISTRICT COURT DISTRICT OF MAINE

Federal National Mortgage Association CIVIL ACTION NO: 1:21-cv-00206-LEW

Plaintiff MOTION TO EXTEND DEADLINE FOR

FILING OF PLAINTIFF'S MOTION FOR

ENTRY OF DEFAULT AS TO

DEFENDANTS

vs.

Michelle L. Denning a/k/a Michelle Brunton and Michael A. Steele; Cavalry SPV I, LLC

Defendants

RE: VACANT REAL PROPERTY 633 Main Street, Old Town, ME 04468 Mortgage:

January 7, 2008 Book 11272, Page 140

Penobscot County Registry of Deeds

NOW COMES the Plaintiff, Federal National Mortgage Association by and through undersigned counsel, hereby and hereby requests that this Honorable Court extend the deadline for filing of Plaintiff's Motion for Entry of Default as to Defendants by 45 days. As grounds therefore, Plaintiff states that there was an investor change that occurred on or about October 13, 2021. As a result, we are awaiting receipt of an executed assignment of mortgage into the entity/assignee that now holds this mortgage loan, and upon receipt of said executed assignment of mortgage, undersigned counsel for Plaintiff will file a Motion to Substitute Party Plaintiff. Upon this Honorable Court granting said Motion to Substitute Party Plaintiff, undersigned counsel for Plaintiff will file its Motion for Entry of Default as to Defendants.

WHEREFORE, based on the foregoing, Plaintiff is requesting that this Honorable Court extend the deadline for filing of said Motion for Entry of Default as to Defendants by 45 days.

DATED: February 28, 2022 /s/ Reneau J. Longoria, Esq.

Reneau J. Longoria, Esq., Bar No. 5746 Attorney for Plaintiff Doonan, Graves & Longoria, LLC 100 Cummings Center, Suite 303C Beverly, MA 01915

(978) 921-2670 RJL@dgandl.com

CERTIFICATE OF SERVICE

I, Reneau J. Longoria, Esq., hereby certify that on this 28th day of February, 2022 served a copy of the above documents by electronic notification using the CM/ECF system and/or First Class Mail to the following:

/s/ Reneau J. Longoria, Esq. Reneau J. Longoria, Esq., Bar No. 5746 Attorney for Plaintiff Doonan, Graves & Longoria, LLC 100 Cummings Center, Suite 303C Beverly, MA 01915 (978) 921-2670 RJL@dgandl.com

Michael A. Steele 192 Prentiss Street Old Town, ME 04468

Cavalry SPV I, LLC c/o CT Corporation System 128 State Street, #3 Augusta, ME 04330

Michelle L. Denning a/k/a Michelle Brunton 45 Pleasant View Ridge Road, Apt #3 South China, ME 04358